

SUPPRESSED

FILED

MAR 27 2014

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
)
Plaintiff,)
)
)
v.)
)
PARRISH SWANSON, and)
RAYMOND STEPHENS,)
)
Defendants.)
)

4:14CR0096 RWS/TIA

INDICTMENT

COUNT I

CONSPIRACY TO DISTRIBUTE HEROIN

The Grand Jury charges that:

BACKGROUND

1. Defendant **PARRISH SWANSON** (hereinafter referred to as "**SWANSON**"), was, at all times relevant to this Indictment, a police Lieutenant with the Hillsdale, Missouri Police Department.
2. Defendant **RAYMOND STEPHENS** (hereinafter referred to as "**STEPHENS**"), was, at all times relevant to this Indictment, a police officer with the Hillsdale, Missouri Police Department.
3. As Officers of the Hillsdale, Missouri Police Department, defendants **SWANSON** and **STEPHENS** were responsible for, among other things, enforcing the laws of the State of

Missouri and the ordinances of the City of Hillsdale, maintaining order within the City of Hillsdale, and making truthful and accurate reports of their official activities, as well as reporting their knowledge of any illegal and unlawful activities within the City of Hillsdale.

4. During March, 2014, defendants **SWANSON** and **STEPHENS** agreed to assist an associate, a suspected drug dealer, rob, or what is more commonly referred to as “rip off”, a drug courier of an amount of heroin within the City of Hillsdale. The associate agreed to pay **SWANSON** and **STEPHENS** cash for their assistance in conducting the drug “rip off”.

5. On March 20, 2014, as previously agreed, defendant **STEPHENS**, while on duty as a Hillsdale police officer, approached the drug courier and robbed him of approximately four ounces of suspected heroin. Defendant **STEPHENS** later met with the associate, gave the associate the suspected heroin that he had obtained during the drug “rip off”, and, in exchange, received \$900.00 cash. Defendant **STEPHENS** later met with defendant **SWANSON**, as previously agreed between the two, and gave him \$200.00 of the \$900.00 cash he had received from the associate for conducting the drug “rip off”.

6. Beginning during in or about January, 2014, and continuing to on or about March 20, 2014, in the City of Hillsdale and elsewhere in the Eastern District of Missouri, the defendants,

**PARRISH SWANSON, and
RAYMOND STEPHENS,**

did knowingly and willfully conspire, combine, confederate and agree with each other and other persons known and unknown to this Grand Jury, to commit offenses against the United States, to wit: to distribute and possess with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

All in violation of Title 21, United States Code, Section 846, and punishable under Title 21, United States Code, Section 841(b)(1)(C).

**COUNT II
ATTEMPT TO DISTRIBUTE HEROIN**

7. The Grand Jury realleges paragraphs 1 – 5 of Count I of this Indictment as if fully set forth herein.

8. On or about March 20, 2014, in the City of Hillsdale and elsewhere within the Eastern District of Missouri, the defendants,

**PARRISH SWANSON, and
RAYMOND STEPHENS,**

acting together and aiding and abetting one another, did knowingly and intentionally attempt to commit an offense against the United States: to attempt to distribute heroin and to attempt to possess with intent to distribute heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 846, and Title 18, United States Code, Section 2.

A TRUE BILL

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

HAL GOLDSMITH
Assistant United States Attorney